

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of: **RM-11338**

Petition for Rule Making of the NAB to Permit AM Radio Stations' Use of FM Translators.

Larry Langford as Licensee of station WGTO (AM) Cassopolis, Michigan hereby tenders comments on the above mentioned Petition by the National Association of Broadcasters.

It was with shock and awe that I read the proposal from the National Association of Broadcasters for use of FM translators by AM stations. To be quite honest, I read each and every page more than once looking for the proverbial "rat" which I expected to find after hearing that the NAB was behind a move to put AM stations on FM translators. But I am more than pleased to report that upon intense study of this document no such "rat" could be found.

The NAB has historically been on the side of big business in the broadcasting industry and this is understood based on the large dues paid by those stations under the control of large corporations.

Industry observers must note that on the surface it would seem strange for the NAB to be taking a position that could support a major change in the broadcast skyline for small low power, and daytime only stations.

The reasons given by the NAB for support of the petition seem solid and well grounded. I would agree with many of the technical and social reasons for allowing the use of FM frequencies for AM stations.

While I support the spirit of NAB petition wholeheartedly, I must address some concerns. FM spectrum is not unlimited. It is my desire that some form of “pecking order” be established on how stations would rank in requesting the use of FM frequencies in areas where available FM spectrum is scarce. Beyond stating that the new translator would not have its 60dbu contour outside the 2mv/m of the AM station, or 25 miles, whichever is the lesser, the NAB is silent on power limitations and exclusions. In the NAB petition it speaks of high noise levels affecting even the daytime coverage of high power AM stations. I would not want to see the use of translators to in effect allow a wholesale conversion of all AM stations to the FM band. The NAB petition does not address the question on limitation of the number of translators that can be in service by a single AM station.

The document also needs to address how the Commission will handle multiple requests with limited availability.

Some form of ranking will be needed based on:

- (a) Current service class of the AM station. A suggested order of preference would be:

- 1/ Daytime Only 1 Kilowatt or lower

2/ Daytime with Post Sunset Authority (PSSA) of less than 50 watts

3/ Full time stations with same power day and night except class A and B

4/ Other full time stations including class A and B directional

In lieu of this, a ranking could be made based on the power ratio of the day signal versus the night signal of each AM station asking for a translator. This would also give day only stations highest priority since their ratio would be Day signal versus no signal.

(b) Service location. Stations which are the only commercial stations licensed to their community and located at least 25 miles from the center of a major metro area would have a higher preference since local FM frequencies would be more readily available and the translator would be the "First FM Service" for that community.

While even 50 KW AM stations may be affected in some areas by increased noise levels, I cannot see the need for a translator for any non directional 50kw unlimited station.

I would also like to address one other point that is not in the NAB petition. Selection of AM stations for a grant of an FM translator must not be done on any type of auction basis. This would automatically exclude those stations in

greatest need of the translator. The ones that have been able to “hold on” over the many years of deteriorating AM reception conditions and increasing market challenges by FM and satellite services already in the same or close markets.

Protections should be put in place so that 50 kilowatt stations are not able to grab up all available frequencies while those stations in the greatest need get excluded. I trust the Commission in its wisdom will address these concerns and establish solid criteria for ranking of stations by studying the comparative benefit of “fill on “ service from the translator. In the case of WGTO, it is the only station licensed to Cassopolis Michigan and Cassopolis is far enough from any metro area that WGTO is truly a local station, not a station licensed to a metro suburb with most of its signal over the nearby “big city.”

It will be the rural areas such as Cassopolis that will get the most favorable impact from adding an FM signal that directly translates the only broadcast station in the market.

In the case of WGTO, the daytime signal easily provides the required 5 mv/m contour over the city of license, but the night time level of 35 watts provides a noise free signal only about as far as you can see the tower beacon.

The 2mv/m /60 dbu contour suggestion in the NAB proposal would be more than adequate for us to achieve decent local service that would rival our daytime coverage without exceeding the specifics suggested in the petition. The NAB has struck upon a truly proactive and fair way of dealing with some of the technical issues that are threatening to kill the nations oldest broadcast service. I applaud them for this endeavor. I would go a step farther by also asking the Commission not rule out the possibility of using TV channel six spectrum to expand the available FM channels to accommodate all AM stations that need fill in service.

With the caveat that care must be given to the selection process, I fully endorse the NAB petition and pray that it will receive favorable treatment before the Commission and result in a rapid Report and Order.

Larry Langford